

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

DR. LAKSHMI ARUNACHALAM,	)
	)
Plaintiff,	) C.A. No. 20-1020-LPS
	)
v.	)
	)
LORI A. GORDON, et al.	)
	)
Defendants.	)

**DEFENDANT FACEBOOK, INC.’S JOINDER IN REPLIES IN SUPPORT OF  
MOTIONS TO DISMISS THE AMENDED COMPLAINT PURSUANT TO  
FED. R. CIV. P. 8 AND 12(b)(6) AND FOR PRE-FILING INJUNCTION**

Facebook, Inc. (“Facebook” or “Defendant”), by and through its undersigned counsel, respectfully submits this reply and also joins in the reply papers concurrently filed in support of the motions to dismiss the Amended Complaint by Defendants Apple, Inc., Alphabet, Inc., JPMorgan Chase & Co., and SAP (the “moving defendants”).<sup>1</sup>

Plaintiff’s opposition brief<sup>2</sup> makes no arguments specific to Facebook. Indeed, Facebook is never even mentioned. Instead, Plaintiff’s opposition brief advances (1) a series of unsupported arguments that her rights have somehow been violated, (2) that defendants, as a whole and without distinction, acted as state actors, and (3) that prior court orders and decisions are void. Plaintiff’s opposition brief fails to respond to the specific arguments advanced in support of dismissing the complaint with prejudice including the fact the complaint fails to satisfy Rule 8 and fails to state a claim under Rule 12(b)(6) for any of the causes of actions alleged. Accordingly, to avoid

---

<sup>1</sup> Defendant Apple Inc.’s Motion To Dismiss The First Amended Complaint Under Fed. R. Civ. P. 12(b)(6) And 8 (D.I. 191), Defendant Alphabet, Inc.’s Motion To Dismiss Plaintiff’s First Amended Complaint (D.I. 226); Defendant JPMorgan Chase & Co. et al.’s Motion To Dismiss The Amended Complaint Pursuant To Fed. R. Civ. P. 12(b)(6), For A Pre-Filing Injunction, And For A Pre-Filing Bond (D.I. 198); and Defendant SAP’s Motion To Dismiss Plaintiff’s First Amended Complaint And To Declare Plaintiff A Vexatious Litigant (D.I. 202).

<sup>2</sup> Plaintiff’s opposition exceeds the 20-page limit of D. Del. L.R. 7.1.3(a)(4).

burdening the Court with duplicative arguments, Facebook hereby joins in the replies filed by the moving defendants, incorporating by reference the arguments and citations therein.

Facebook reserves all rights to supplement the arguments made in its papers and as incorporated by the moving defendants, including with any arguments that may be presented at a scheduled hearing on the motions to dismiss and for a pre-filing injunction.

**WHEREFORE**, for the reasons stated in Facebook's previous Joinder (D.I. 221), herein, and in the replies identified herein, Defendant respectfully requests that the Amended Complaint be dismissed with prejudice, a pre-filing injunction be entered, and the Court award any further relief as the Court deems just and proper.

Respectfully submitted,  
POTTER ANDERSON & CORROON LLP

By: /s/ Alan R. Silverstein  
Bindu A. Palapura (#5370)  
Alan R. Silverstein (#5066)  
Stephanie E. O'Byrne (#4446)  
Hercules Plaza, 6<sup>th</sup> Floor  
1313 N. Market Street  
Wilmington, DE 19801  
Tel: (302) 984-6000  
[bpalapura@potteranderson.com](mailto:bpalapura@potteranderson.com)  
[asilverstein@potteranderson.com](mailto:asilverstein@potteranderson.com)  
[sobyrne@potteranderson.com](mailto:sobyrne@potteranderson.com)

Dated: July 19, 2021  
7299363/51856

*Attorneys for Defendant Facebook, Inc.*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

**CERTIFICATE OF SERVICE**

I hereby certify that on July 19, 2021, the attached document was electronically filed with the Clerk of the Court using CM/ECF which will send notification to the registered attorney(s) of record that the document has been filed and is available for viewing and downloading

I hereby certify that on July 19, 2021, the attached document was sent by Electronic Mail and First Class Mail to the following person(s):

Dr. Lakshmi Arunachalam  
222 Stanford Avenue  
Menlo Park, CA 94025  
[laks22002@yahoo.com](mailto:laks22002@yahoo.com)

By: /s/ Alan R. Silverstein  
Bindu A. Palapura  
Alan R. Silverstein  
Stephanie E. O'Byrne  
Potter Anderson & Corroon LLP  
Tel: (302) 984-6000  
[bpalapura@potteranderson.com](mailto:bpalapura@potteranderson.com)  
[asilverstein@potteranderson.com](mailto:asilverstein@potteranderson.com)  
[sobyrne@potteranderson.com](mailto:sobyrne@potteranderson.com)

7295657